

### III. REMARKS

Claims 1-22 are pending in this application. By this amendment, claims 1, 6, 7, 11, 14, 15 and 18 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-22 are rejected under 35 U.S.C. §103(a) as allegedly being anticipated by Goldberg *et al.* (U.S. Patent No. 6,496,833), hereafter "Goldberg," in view of Pepin (U.S. Patent No. 6,948, 150), hereafter "Pepin." Applicants respectfully traverse this rejection for the following reasons.

With regard to the 35 U.S.C. §103(a) rejection over Goldberg in view of Pepin, Applicants assert that the cited references do not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 6, 11, 14, 15 and 18, Applicants respectfully submit that the cited references fail to disclose that, *inter alia*, at least one physical code generator is independent from each other of the at least one physical code generator. Instead, in the Goldberg reference all of the code generators are included in a single query object generator. Nowhere does Goldberg teach or suggest that each of the physical code generators is independent from each other.

Likewise, Pepin does not teach or suggest that each of its components is independent from each other component. Instead, the portion of Pepin cited by the Office teaches a plurality of components associated in a single data structure contained in a metadata. Col. 7, lines 51-65,

FIG. 7. The illustrated data structure has both two code generators that, as they belong to the same data structure, are not independent from each other.

In contrast, the claimed invention includes "...wherein at least one physical code generator is independent from each other of the at least one physical code generator." Claim 1. As such, each of the at least one physical code generators of the claimed invention are not merely included in a single piece of code such as the query object generator as in Goldberg or subsumed in the same data structure as in Pepin, but instead, is independent from each other of the at least one physical code generator. Thus, the generator class of Goldberg and components of Pepin do not teach or suggest the code generator of the claimed invention. In view of the foregoing, Applicants respectfully submit that the cited references fail to teach each and every feature of the claimed invention. Accordingly, withdrawal of the above-cited rejections is requested.

With further respect to independent claims 1, 11, 14, 15 and 18, and with respect to dependent claim 7, Applicants respectfully submit that Goldberg also fails to teach that, *inter alia*, "...said generator dictionary is adapted to be amended by the user to replace at least one code generator with a replacement code generator," as recited in claim 1 and claimed similarly in claims 7, 14, 15 and 18. The passage of Goldberg cited by the Office teaches

Other DBMS APIs may also be accommodated by adding new subclasses to the class hierarchy as indicated schematically by dotted class (ODBCJavaQueryObjectImplGenerator). Each database that is added requires a separate subclass with a specific DBMS API interface."

To this extent, Goldberg teaches only adding new subclasses for accommodating DBMS APIs and does not teach replacing a subclass with a replacement subclass. Furthermore, Goldberg does not teach that the addition of subclasses may be performed by a user.

The Office further cites Pepin for allegedly teaching an ability to make changes to a component "...independent of a design tool as in conventional systems." Col. 2, lines 13-16. However, the passage of Pepin cited by the Office teaches making changes to a particular component and does not teach replacing a component with a replacement component. Furthermore, Pepin teaches that the modifications to the component are made by the component supplier and not by a user. Col. 2, lines 9-13; col. 7, lines 58-61.

The claimed invention, in contrast, includes "...said generator dictionary is adapted to be amended by the user to replace at least one code generator with a replacement code generator." Claim 1. As such, as opposed to the new subclasses in Goldberg that can only be added and the component in Pepin that is merely modified, in the current invention, a user may amend the generator dictionary to replace at least one code generator with a replacement code generator. For the above reasons, the addition of new subclasses of Goldberg and the components of Pepin do not teach the user replacement of at least one code generator with a replacement code generator as included in the present invention. Accordingly, Applicants request that the rejection be withdrawn.

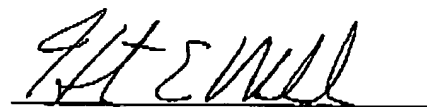
With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

#### IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

  
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